AT&T has proposed that queries not be performed until at least one number has been ported from an NXX and cites the North American Numbering Council ("NANC") flows. This proposal would require that translations be built, activated and tested in each switch for each NXX in a five-day interval that is triggered by a NPAC message when the NPAC receives the first subscription create request in an NPA-NXX. See SBC LECs Rebuttal at 7. Setting aside the facts that this process from the NANC Technical and Operations group (1) was focused solely on the NPAC processes, (2) did not address internal network routing translation processes for carriers, and (3) only provided a deadline by which preparations must be completed and not the start date for those preparations, the proposal is not a workable one. The NPAC flows indicate that the NPAC SMS "will broadcast a 'heads-up' notification to all service providers via both LSMS and SOA interfaces," and "[u]pon receipt of this message, all service providers, within five (5) business days, will complete the opening for the NPA-NXX code for porting in all switches."[18]

As an initial matter, five days is not adequate to perform the processes required to activate querying in multiple switches. Of equal importance, not all service providers will have direct access to the NPAC. There is, therefore, no process or industry vehicle for dissemination of this information to non-user service providers. Again, the LERG is the industry vehicle used for the timely dissemination of uniform routing information on a national basis.

[18]See North American Numbering Council ("NANC") Local Number Portability Administration ("LNPA") Selection Working Group Report Appendix E, LNPA Technical and Operations Requirements Task Force Report, at Appendix B (April 25, 1997), (adopted by reference in the Second Report and Order).

Three CLEC requirements have been key drivers which have defined SWBT's process:

i. CLECs have required that ILEC be able to port the first number within a NXX within five days. Five days is not adequate to develop, input and test routing translations in multiple switches. It is, instead, a recipe for routing problems. MCI has been critical of SWBT for its handling of Pre-LNP activation of new NXX codes, and SWBT has worked with MCI to enhance its activation processes and to introduce more exhaustive testing. Attempting to force fit these steps for multiple switches for each NXX into a five-day interval simply will not work and will exacerbate the opportunity for routing problems.

ii. CLECs have required that all NXXs within selected switches be made portable now. They were not interested in a phased introduction that only included those NXXs in which they were targeting customers. Such an introduction would have permitted ILECs to more gradually phase in their NXX query activations accordingly. Yet, by their own admission, many CLECs have targeted their marketing efforts to a select group of customers.

iii. CLECs have also required that all new NXXs added to selected switches within a MSA be made portable.

b. The Time Warner "Solution" is No Solution.

As we have pointed out before (see SBC LECs Rebuttal at 7-17), Time Warner's tandem "solution" is not a feasible long-term solution for several reasons:

First, Time Warner's "solution" violates the FCC's requirements in that it creates disparities for carriers connecting to ILECs at the tandem versus carriers connecting at the end office. Calls from carriers using direct end office trunking that are misdialed to a vacant number in a portable NXX with no porting will trigger a query in the end office which will result in billing. Calls from carriers that connect at the tandem to vacant numbers within NXXs with no porting would trunk over a common trunk group to the end office, and although a query is performed, there would be no way to identify or bill the N-1 carrier.

Second, Time Warner's "solution" requires manual intervention. ILECs must react to the NPAC "heads up" message to know to activate querying in the tandem or end offices within five days. This requires the use of a manual process. Coupled with the inadequate timeframe, Time Warner's proposal creates further opportunities for routing errors.

Third, Time Warner's proposal creates a much more complicated code opening process with disparate call-handling processes for tandems and end offices which increases risk of mistakes and routing troubles on fundamental and critical LNP network processes.

Fourth, the introduction of different handling of like calls by different switches not only creates a higher risk of human error, but it also significantly complicates trouble shooting when LNP-related problems occur. For example, some carriers will use tandem connections where the switch would only query on calls to NXXs with a ported number. Other carriers will use direct end-office connections where the switch will be translated to query on calls to all portable NXXs. Still other carriers will use a combination of both with a high usage direct trunk group and a overflow tandem final trunk group. Additionally, given the LERG's incipient unreliability under the Time Warner "solution," there will also be no common industry document that provides routing information for each NPA-NXX.[19]

c. Billing for Queries Is Appropriate.

The FCC has required queries for interswitch calls to NXXs where number portability has been made available. The FCC has also determined that ILECs can charge carriers when they perform prearranged or default calls to these NXXs. A key question, therefore, is what constitutes portability being made "available" for a NXX. Simply stated, portability is available for a NXX at the effective date of the NXX as listed in the LERG. At that point in time, carriers will have completed their routing translations and porting of individual numbers can begin.

Portability cannot be considered to be available at the point in time that a NXX is input into the LERG, because at that point numbers cannot yet be ported. LNP is not available to customers. Availability also cannot reasonably be defined as the time that

[19] Time Warner has recently complained about the complexity of LNP trouble resolution in a multi-service provider environment based on their experiences with a LNP-reported trouble involving three service providers in the northeast. However, as demonstrated, their proposal would create a much more complex system which would serve only to further complicate trouble resolution.

the first porting order is received. Although portability will certainly be available when the first number is ported, it will be available to a customer in a carrier's network by the LERG effective date, which may be earlier than the date of the first order. Receipt of the first porting order does not indicate when portability is available, it is indicative only of the first time that it is used.

The FCC has established competitive neutrality as the cornerstone of cost recovery. The proposal to delay billing for queries until the first number ports threatens this principle. SWBT, Pacific Bell, and CLECs who have chosen to invest in a full facilities-based network and to provide their own queries, have had to develop a network robust enough to accommodate querying on all interswitch calls to portable NXXs due to the inability to accurately predict LNP usage and the distribution of ported numbers across NXXs. These carriers cannot avoid this cost. In fact, for these facilities-based CLECs, there are no additional costs to utilize the SWBT/Pacific Bell solution of querying interswitch calls to every portable NXX. As previously explained, the query charges have been established to recover a reasonable portion of SWBT and Pacific Bell-carrier specific direct LNP costs including provision of SWBT's and Pacific Bell's LNP databases.

Facilities-based carriers that have chosen not to provision their own database want to limit their database costs, which they are purchasing on a per query basis, to only those queries where a number has been ported. This creates an environment that penalizes carriers who are willing to invest in their network to provide their own database services. Delaying billing would require fundamental modification to SWBT and Pacific Bell's billing systems. Delaying billing, therefore, requires adoption of permanent changes at a

cost to LNP facilities-based LECs to address a temporary issue for this subset of carriers that do not perform their own queries and wish to avoid their fair share of the cost of deploying LNP.

Carriers agree that queries are required on all calls to NXXs where at least one number has been ported. Even with modest LNP activations it is possible and perhaps likely that ported numbers will be spread across a broad number of NXXs in a relatively short period of time.

The only justification for a permanent solution that does not include queries for LNP available NXXs is if CLECs believe that LNP will not spread across most, if not all, of the portable NXXs in a short period of time. If CLECs believe this to be true, then they should revisit their request for NXX activation in MSAs where translation work has not yet been completed. It is inappropriate to require that ILECs modify their systems to compensate for a lack of planning by these CLECs.

5. Additional Points.

The FCC has clearly stated that SWBT and Pacific Bell have the right to bill carriers for queries performed on their behalf calls that are directed to NPA-NXXs for which number portability has been made available. It is our understanding that Ameritech is using the same basic process for activation of querying for NXX Codes designated as portable in the LERG as SBC LECs, but is developing billing capabilities to bill only for queries on calls to NPA-NXXs which have at least one ported number. While SWBT and Pacific Bell do not disagree with Ameritech's or other carriers right to make a business decision to forego cost recovery and not bill for queries they perform, their decision has no bearing on the FCC's authorization of SWBT's and Pacific Bell's

right to bill for these queries on calls to NXXs where number portability has been made available.

The Bureau's inquiry through the Designation Order into when terminating carriers providing query services to N-1 carriers may charge for them is, therefore, misplaced. The question the Bureau should address is not whether terminating carriers may charge for queries when LNP is available; that question has been answered. The real question for the Bureau is simply the price.

H. **Designation Order at ¶ 14.** *"We solicit comment on whether it would be reasonable to require incumbent LECs to recover all of their query service costs associated with all NXXs only in NXXs from which a number has ported, and what rate levels for query services would result from such a recovery mechanism."*

The SBC LECs Query Tariff rate structure was developed assuming queries would be made for all interswitch calls to all portable NXXs from the date of their opening. To the extent that the SBC LECs perform the queries for N-1 carriers that send calls to NXXs where portability is available whether on a prearranged or default basis, the Query Tariffs assume for demand and rate purposes that the N-1 carrier will be charged for the database query service.

LECs choose through the process authorized under the First Reconsideration Order the central office switches in which number portability is to be deployed.[20] After the switch selection process is initiated, both for the initial deployment of number portability and later for additionally-designated switches, the SBC LECs and other LECs are required to make ready those switches to permit porting on the time schedule the Commission prescribed. The SBC LECs and other LECs have no choice but to upgrade

[20]First Reconsideration Order at ¶¶ 59-71.

switch software and to incur the costs of building SS7 and database networks capable of handling queries to all switches that LECs have requested be made number portable.

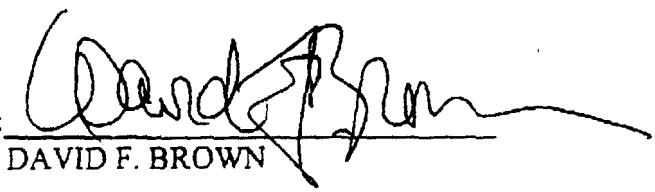
The Bureau has posed the hypothetical question of what SWBT's and Pacific Bell's query service rate levels would be if all of the query service costs associated with all NXXs designated as number portable based on their having been selected would be recovered only from NXXs from which a number has ported. The requested data is contained in Appendix C.

III. CONCLUSION

Even before the Designation Order was issued and this consolidated direct case was filed, SWBT and Pacific Bell had shown that their Query Tariffs meet all of the requirements prescribed by the Commission and have met their burden under Section 204(a)(1) of the Act. The Bureau should conclude its investigation of the SBC LECs' respective Query Tariff and determine that the rates, terms, and conditions are just and reasonable.

CERTIFICATE OF SERVICE

I, David F. Brown, hereby certify that the copies of the foregoing CONSOLIDATED RESPONSE OF SOUTHWESTERN BELL TELEPHONE COMPANY AND PACIFIC BELL TO ORDER DESIGNATING ISSUES FOR INVESTIGATION were served by hand or by first-class United States Mail, postage prepaid, upon the parties appearing on the attached service list this 1st day of July, 1998.

BY: 
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APPENDIX A

OSS Systems Name	System Functions	Modifications Required	Reason for Modification
ALPSS/LSS	SBC's mechanized system for white pages maintenance and production ALPSS will replace LSS in 1998.	Software enhancements from Bellcore and internal IT programming support.	Currently the scope of telephone book coverage is based on NPANXX. Enhancements are necessary to support inclusion of SPNP numbers into the correct telephone book editions.
CCSN	Customer Contact Services Node - mechanized system for referral and direct connect to the correct service provider(including CLECs) for trouble reports and repair Note: This system was mandated by the California PUC as part of Local Competition	Bellcore system and software enhancements and new hardware platform Modify switch tables with ported-in prefixes.	Extends to SPNP customers ability to update services without going through a service rep. Without modifications PB service reps and/or the automated system would not be able to refer calls to the correct service provider for ported numbers.
COSMOS	Computer System for Mainframe Operations - maintains inventory of telephone numbers	Bellcore system software enhancement to support CLEC prefix for areas not converted to SWITCH	Modify database to maintain new SPNP data elements for TN administration (e.g., ported in, ported out) so ported out numbers will not be reassigned.
E911	Emergency Notification System	Software enhancements to allow operator access to correct physical location information. New service logic created to support SPNP data and customer address information changes and service provider changes.	Without this enhancement a 911 operator would get old information (SWBT address information) for ported customers. (e.g. If a ported customer subsequently moves within the rate center and/or changes to another service provider the correct address would not to available)
EB	Electronic Bonding - allows a wholesale customer to review billing and review and/or create trouble reports for ISDN.	System software enhancement to accept CLEC prefix and SPNP FIDs (ported in/ported out, etc.)	OSI Software system enhancement to accept trouble reports, billing inquires and proper rating locations from CLEC for ISDN SPNP service orders.
IPMS	Integrated Process Management System - supports complex (circuit designed) services tracking, completion, and maintenance	New service logic and additional table to support SPNP data elements for Service Assurance on complex services	Enhancements allow the porting in and porting out of complex services.
LATIS I/F	Loop Activity Tracking System. Collects facility modifications from LFACS.	System software enhancements from Bellcore to recognize new SPNP tags	LATIS must be able to recognize new SPNP tags and FIDS. Modifications are to support the porting in of CLEC numbers for SWBT retail and wholesale/resale services Without changes, service orders would fallout of mechanized flows which could result in service delays and possible outages.

OSS Systems Name	System Functions	Modifications Required	Reason for Modification
LEIS	Loop Engineering Inventory System	System software enhancements from Bellcore.	LEIS must be able to recognize new SPNP tags that will appear in extracts from LFACS. Modifications are to support the porting in of CLEC numbers for SWBT retail and wholesale/resale services. Without changes service orders would fallout of mechanized flows which could result in service delays and possible outages.
LFACS	Loop Facilities Analysis Control System - database for facility information and assignment system	Bellcore system software enhancement to recognize SPNP FIDS	New service logic to support identification of outside facilities for both ported in and ported out numbers.
LIDB	Line Identification Data Base (Calling Card and 3rd Party billing information)	Software changes to show carrier ownership at the line level of detail for SPNP functionality	LIDB needs to be upgraded to handle and interpret new SPNP information for calling card and 3rd party billing.
LMOS/ Front End and Host	Loop Maintenance Operating System - trouble reporting system for line and loop equipment associated with newly activated service and existing service.	Lucent system software enhancement to support SPNP data for the local loop	Ability to track newly ported numbers for service problems that might occur during porting in and/or porting out service.
LSMS	Local Service Management System	New system deployment to support SPNP Service Provisioning	New system being created to support all SPNP related service provisioning and activation in the OSS and network environment.
MARCH	Mechanized Adivate/Assignment Recent Change Hosts (MARCH) is the translations interface from SOAC to input TN line translations directly from the service order into switch platform.	New SPNP fields required to be interpreted from service order on a 10 digit basis. Software changes to provide the capability to receive new SPNP translations and FIDS.	Without modifications LNP translations would not flow through the switch and would require manual translations on each SPNP service order. 10 digit trigger allows for minimal service distrubance when porting out numbers to a CLEC for non-coordinated transfers of SPNP service.
MLT	Mechanized Loop Testing system used downstream of LMOS for the automatic testing of new and existing services.	Lucent system software and hardware enhancements to support SPNP data elements and ten digit dialing for remote testing of SPNP services. Requires modifications to use LRN and other line records information to identify test equipment.	Without modifications SPNP services could not be automatically tested by the field technicians and service representatives to ensure proper installation.
MPF/WCS	Media Pulse Force - supports the work force management in central offices for service orders	Bellcore system software enhancement to support work force scheduling with a CLEC for SPNP service activation, disconnect, and assurance dispatch requests when the service involves a facility transfer.	Central office work forces would not be automatically scheduled to work with a CLEC for SPNP orders without this modification.

OSS Systems Name	System Functions	Modifications Required	Reason for Modification
MTS	Provides auto transmission forms dealing with NPANXX and telephone number ranges.	Software enhancements from LUCENT.	New and updated forms required for 1AESS, 5ESS, and DMS100 for LNP to continue mechanized provisioning of the switches for non-resident NXXs.
NETPILOT	Provisioning interface between LSMS and Signaling Transfer Point (STP).	New feature development to extricate and steer global title and LRN information from NPAC downloads to multiple STP locations.	New system software is required to perform SPNP related Global Title Translations (GTT) and LRN provisioning on Signaling Transfer Point (STP) platforms.
NPAC-SMS	Regional service management system provided by Lockheed/Martin. Required for overall SPNP routing of numbers based on LRN	Requires interface between SOA and NPAC and also NPAC to LSMS for transmission of SPNP data	Required foundation system for SPNP functionality.
NSDB	Maintenance support database for trunks, special service and ISDN circuits. Provides info on order activity, associated facilities, billing and services.	Software enhancements from Bellcore to support SPNP services.	NSDB must be able to recognize new SPNP tags and FIDS. The systems modifications are to enable NSDB to retain SPNP indicators from SOAC to match TNs porting in or out. The system is part of the provisioning process for special designed services.
OSMOP	Operator Services Marketing Order Processor - master database to LIDB	Application programming, interface enhancements, M&P. Installation of Bellcore LIDB enhancement to handle CLEC calling card information.	Handle SPNP service order data, support SPNP data elements in Operator Services. Without modifications operators would not have correct information for SPNP customers.
PAWS	Provisioning Assigner Work Station used in the provisioning of outside plant and central office facilities.	Direct interface with Bellcore provisioning systems (SOAC, LFACS, SWITCH). Requires updates to recognize and parse new SPNP FIDS and USOCs.	Modifications to recognize an LNP order and send to the appropriate work group/service center for manual support.
PBSM	Pacific Bell Service Manager - to create and review CLEC trouble reports	System software enhancement to recognize SPNP service order	Accept trouble entry with SPNP data elements from CLECs.
PREDICTOR	Provisioning- Installation/Repair resource of Central Office based services	System software enhancement to support both ported in and ported out numbers	Distinguish ported in and ported out TNs, includes LRN to indicate the receipient switch.
RCWM	Work manager and reject adjudicator for RCMAC (Recent Change Memory Admin. Center) work center.	System software enhancements from Beechwood.	RCWM must be able to recognize and handle SPNP provisioning messages and FIDS from upstream systems or proper switch translation will not occur and will fall out for manual intervention.
SOAC	SBC's Service Order Assignment and Control (SOAC) System. Receives service orders and broadcasts them via SOA to the NPAC to coordinate porting activity.	System software enhancements from Bellcore.	SOAC must be able to recognize and parse SPNP data for downstream systems for accurate and mechanized flow through of SPNP service orders. SOAC also interfaces with SOA for transmittal of SPNP data to the NPAC.

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July 1, 1998

OSS Systems Name	System Functions	Modifications Required	Reason for Modification
SWITCH/FOMS	SBC's system for inventory and assignment of telephone numbers, inside plant facilities and frame operations management.	System software enhancements from Bellcore to support new SPNP FIDS and USOCs and inventory/add foreign (CLEC) telephone numbers on a realtime basis and flag ported out numbers to prevent reassignment within SWBT.	Modifications to SWITCH system will enable the porting in of CLEC TNs and the tracking of ported out TNs and "snap-back" for reassignment of SPNP disconnects.
WFA/C	Work Force Administration Control - tracks work activity for central office and field technicians involved in the installation and maintenance of special services.	Software enhancement to receive, process, store and pass SPNP indicators.	Would not be able to provide trouble tickets on special services on ported in numbers and could incorrectly handle ported out numbers.

APPENDIX B

APPENDIX B

The following assumptions and associated reasoning for those assumptions were used in the development of the SBC LECs' forecast for queries performed for N-1 carriers:

I. General Assumptions

ASSUMPTION:	REASONING:
100% deployment of LRN software in switches in an MSA	For the top 100 MSAs, state PUCs canvassing the CLECs as to which switches they wanted to be made portable. Nearly 100% of the switches in the SBC LECs' MSAs were selected.
All queries made by an SBC LEC for an N-1 carrier will be charged to them.	Per the Second Report and Order ¶ 75, "We note further that if the N-1 carrier does not perform the query, but rather relies on some other entity to perform the query, that other entity may charge the N-1 carrier . . .."
Once an NXX is listed in the LERG as being portable, all call attempts to that NXX will be queried.	Because CLECs requested via "bona fide" request that the LERG show all NXXs in a portable capable switch to be made portable, it was anticipated that CLECs would be porting out of each NXX requested.
SWBT average number of completed originating calls per month (180 - bus, 150 - res, 160 average) = average number of completed terminating calls per months.	Historical data.
California's call attempt to call completion ratio (78% for residence and 82% for business) can be applied to SWBT data.	California data is applicable to SWBT.
In SWBT, call attempts per residence line per month is 192, per business line per month is 22 with an average of 202.	Application of California data to SWBT data.
In California, call attempts per line per month is 324.	Historical data.
In Nevada, call attempts per line per month is 345.	Historical data.

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1998 queries per state: AR - 0 months, CA -3 months, KS - 115 months, MO - 6 months, NV - 0 month, OK - 115 months, TX - 6 months, 1999 through 2002 - 12 months for all states	The amount of time used to determine queries in each state is based on the 1998 completion dates (CD) of that state's MSAs:

STATE	MSA	'98 CD	Average # months
AR	Little Rock	12/31	0
CA	Los Angeles	7/19	average 3 months
	Riverside	8/18	
	San Diego	8/18	
	Orange County	9/17	
	Oakland	9/17	
	San Francisco	9/17	
	San Jose	10/19	
	Sacramento	10/19	
	Fresno	10/19	
	Ventura	12/31	
	Bakersfield	12/31	
	Stockton	12/31	
	Vallejo	12/31	
KS	Kansas City	7/27	average 1.5 months
	Wichita	12/31	
TX	Houston	5/26	average 6 months
	Dallas	6/26	
	Ft. Worth	7/27	
	Austin	9/30	
	San Antonio	9/30	
	El Paso	12/31	

APPENDIX B

II. Assumptions Relating to Queries Caused by Different Categories of N-1 Carriers:

ASSUMPTION	REASONING
Cellular: • 60% of cellular companies will use SBC LEC's LNP database. • 60% of cellular companies = 60% of terminating MOU. • Average length of call is 1.5 minutes.	Cellulars can use either SBC LECs' query service that of another vendor. Industry data was used for the average call length. Historical data and forecasted MOU used for terminating MOU.

Queries performed for wireless: (terminating MOU/average length of call) * call % * (number of months charge is applicable) * (25% for Database Query charge, 60% Prearranged Query charge, 60% Prearranged Query charge, 15% Default Query charge)

IXC:	
• The Big 3 IXCs will perform their own queries • 60% of IXC MOU, less the Big 3, terminating on SBC LECs' network generates a query using SBC LECs' query service. • Average length of call is 6 minutes.	AT&T, MCI, and Sprint have expressed that they will perform their own queries. The smaller IXCs that do not invest in their own LRN software and LNP database can use either the SBC LECs' query service or another vendor. Forecast MOU used for terminating MOU. Historical data used for average length of call.

Queries performed for IXCs: (terminating MOU/average length of call) * 60% * (# of call attempts per month) * (number of months charge is applicable) * (25% for Database Query charge, 60% Prearranged Query charge, 15% Default Query charge)

ILEC:	CLECs will not invest in their own LRN software and LNP database. They will use SBC LECs' query service.
100% of call attempts entering SBC LECs" network will generate a query 100% of queries will be performed by SBC LECs Call attempts made by CLEC end users equal those made by SBC LECs end users. 60% of call attempts in ILECs switch are for interswitch, local calls.	

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Queries performed for ILECs: (# of lines) * 60% * (# of call attempts per month) * (number of months charge is applicable) * (SWBT: 100% for Database Query charge and 50% Prearranged - 50% Default for Query charge; CA: 100% for Database charge and 100% for Prearranged for Query charge))

APPENDIX B

III. Quantity Of LNP Queries Triggered By End Users In SBC Switches [SBC End Users, Resold Accounts, And Feature Group A End Users]

ASSUMPTIONS:

1. 100% deployment of LRN software in SBC LECs' switches in an MSA.
2. Once an NXX is listed in the LERG as being portable, all call attempts to that NXX will be queried.
3. The average number of completed originating calls per month (SWBT: 180 bsns, 150 - res, 160 average) = average number of completed terminating calls per month
4. California's call attempt to call completion ratio (78% for residence and 82% for business) can be applied to SWBT data.
5. In SWBT, call attempts per residence line per month is 192, per business line per month is 220, and average of 202.
6. In California, call attempts per line per month 324.
7. In Nevada, call attempts per line per month is 345.
8. 60% of originating landline call attempts generate a query.
9. Queries triggered by SWBT end users includes SWBT Base forecast no porting and porting within SWBT for the following services: Non-lifeline POTS, PBX trunks, Plexar, Centrex, BRI (DigiLine and Plexar I SDN), and PRI (Smart Trunks, Select Video, and Select Data).
10. Queries triggered by California and Nevada end users includes Pacific Base forecasted no porting and porting within California and Nevada for the following services: Non-lifeline POTS, Lifeline POTS, PBX trunks, Centrex, BRI (DigiLine and Plexar ISDN), and PRI (Smart Trunks, Select Video, and Select Data).
11. Average 6 months billing for 1998 in SWBT and 3 months in CA and 12 months for 1999, 2000, 2001, and 2002.

FORMULA:
(# of lines @) * (# of call attempts per month) * 60% * (# of months charged)

@Ratio of access lines to Service Charge-

1:1	non-Lifeline POTS, analog trunks, Plexar
1:0	Lifeline (SWBT)
1:5	Lifeline (California and Nevada)
1:5	PRI
1:1.5	BRI
10:1	Centrex

QUERIES CREATED BY DIFFERENT CATEGORIES OF N-1 CARRIERS:	
ASSUMPTION	REASONING
Cellular	
60% of cellular companies will use SBC's LNP database	Cellulars can use either SBC's query service or that of another vendor.
60% of cellular companies = 60% of terminating MOU Average length of call is 1.5 minutes.	Historical and forecasted MOU used for terminating MOU. Industry data
Queries performed for wireless: (terminating MOU/average length of call) * 60% * (number of months charge is applicable) * (25% for Database Query charge, 60% Prearranged Query charge, 15% Default Query charge)	
IXC:	
The Big 3 IXCs will perform their own queries.	AT&T, MCI, and Sprint have expressed that they will perform their own queries.
60% of IXC MOU, less the Big 3, terminating on SBC's network generates a query using SBC's query service.	The smaller IXCs that do not invest in their own LRN software and LNP database can use either SBC's query service or another vendor..
Average length of call is 6 minutes.	Historical data.
Queries performed for IXCs: (terminating MOU/average length of call) * 60% * (number of months charge is applicable) * (25% for Database Query charge, 60% Prearranged Query charge, 15% Default Query charge)	
CLEC:	
100% of call attempts entering SBC network will generate a query.	CLECs will not invest in their own LRN software and LNP database. They will use SBC's query service.
100% of queries will be performed by SBC	
Call attempts made by CLEC end users equal those made by SBC end users.	
60% of call attempts in CLEC's switch are for interswitch, local calls.	
Queries performed for CLECs: (# of facility based access lines + unbundled loops) * 60% * (# of call attempts per month) * (number of months charge is applicable) * (25% for Database Query charge, 60% Prearranged Query charge, 15% Default Query charge)	
ILEC	
100% of call attempts entering SBC network will generate a query	CLECs will not invest in their own LRN software and LNP
100% of queries will be performed by SBC	
Call attempts made by CLEC end users equal those made by SBC end users	
60% of call attempts in ILECs switch are for interswitch, local calls	
Queries performed for ILECs: (# of lines) * 60% * (# of call attempts per month) * (number of months charge is applicable) * (SWBT: 100% for Database Query charge and 50% Prearranged - 50% Default for Query charge; CA: 100% for Database Query charge and 100% for Prearranged for Query charge.)	

APPENDIX C

SWBT'S QUERY RATES[1]

WHERE

QUERIES ARE BILLED ONLY AFTER THE FIRST NUMBER IS

PORTED IN AN NXX

QUERY TYPE	CURRENT RATE	NEW RATE	PERCENT CHANGE
Prearranged	0.001449	0.001466	1.2% +
Default	0.001449	0.001466	1.2% +
Database	0.001390	0.001407	1.2% +

PACIFIC BELL'S QUERY RATES

WHERE

QUERIES ARE BILLED ONLY AFTER THE FIRST NUMBER IS

PORTED IN AN NXX

QUERY TYPE	CURRENT RATE	NEW RATE	PERCENT CHANGE
Prearranged	0.001532	0.001554	1.4% +
Default	0.001532	0.001554	1.4% +
Database	0.001532	0.001544	1.4% +

NOTES:

1) **Costs were increased to reflect the changes required in the billing system.**
2) **Costs were increased to reflect changes required to the LSMS and SOA.**
3) **The unit cost per query as reflected in the SBC LEC's March filings were not revised to include the additional costs of implementing the first port concept due to time constraints.**
4) **Demand was decreased to reflect the delay in billing for queries until first port.**

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[1] Responds to the Commission request for information in the Designation Order, FCC DA98-1173 (released June 17, 1998) at ¶ 14